

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

NOV 1 5 1993

HRE-8J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. J. Michael Jarvis Franklin Power Products, Inc. 400 Forsythe Street P.O. Box 667 Franklin, Indiana 46131

Re:

Administrative Order on Consent Franklin Power Products, Inc./Amphenol IND 044 587 848

Dear Mr. Jarvis:

The United States Environmental Protection Agency (U.S. EPA) has reviewed the RCRA Facility Investigation (RFI) report with the revisions of October 1993. This document was submitted in accordance with Section VII.c. of the Administrative Order on Consent (AOC) dated November 27, 1990. Review of the additional data has resulted in the following concern.

Data indicates that contaminant concentrations in groundwater decrease to low levels southward of the facility. However, the existence of the 72 inch storm drain which transverses the site and drains to Hurricane Creek, creates the possibility that contaminated groundwater at the facility may have been recharged to the aquifer in the area of the storm drain outfall. Data indicates that the storm drain intercepts contaminated ground-water at the facility when ground-water levels are above the base of the storm drain. During periods of stream flow this water would be dispersed by the stream flow of Hurricane Creek. However, site conditions may occur in which the creek becomes dry but interception of contaminated water by the storm drain continues for sometime before water levels equilibrate upgradient. Under such conditions recharge of contaminated water to the aquifer near the outfall would occur. Over a period of several years the recharge of contaminated water to the aquifer may have been significant. Further, the contaminants may have moved in a downstream direction in response to the ground-water gradient. At present, Respondents have not provided ground-water data for this critical area.

To address this concern, additional ground-water samples shall be collected at the approximate locations shown in Attachment I. Respondents may collect samples by installing monitoring wells or by the geoprobe method described in "Supplement to October 12, 1992, RFI Work Plan" dated December 28, 1992. Samples shall be collected from the upper ten (10) feet of the saturated zone.

U.S. EPA provides seventy-five (75) days from date of receipt of this letter to submit the additional information in a revised RFI report. In a September 2, 1993 letter, U.S. EPA advised you that the response to comments pertaining to Risk Assessment could be deferred to the corrective measures part of the AOC. Since U.S. EPA has provided seventy-five (75) days to submit the modification, U.S. EPA requests that the Risk Assessment information also be provided with the modification to the RFI report.

If Respondent does not agree to perform additional sampling, Respondent shall notify U.S. EPA within thirty (30) days of receipt of this letter of such response. Such response shall provide an alternative approach to resolve the data gap.

If you have any questions call William Buller of my staff at (312) 886-4568.

Sincerely yours,

Joseph M. Boyle, Chief RCRA Enforcement Branch

cc: Samuel Waldo, Amphenol Mike Sickles, IDEM

Do Not Scale This Drawing